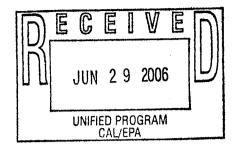
## Countywide Services Agency

Environmental Management Department Mel Knight, Director



Terry Schutten, County Executive Penelope Clarke, Agency Administrator

June 23, 2006



Don Johnson Assistant Secretary California Environmental Protection Agency 1001 | Street P.O. Box 2815 Sacramento, CA 95812-2815

Dear Mr. Johnson:

Attached is a status report regarding the two deficiencies identified as a result of your program evaluation of the Sacramento County Environmental Management Department Certified Unified Program Agency (CUPA) that was completed September 28-29, 2005.

Both deficiencies were minor in nature and necessary corrective actions were implemented within 30 days of the conclusion of the program evaluation.

Questions or comments should be directed to Dennis Green at (916) 875-8469.

Sincerely,

Mel Knight Director

MK:kn

Attachment

## **Deficiencies and Corrective Actions**

**Deficiency**: The CUPA's data system is not correctly identifying repeat minor violations identified during re-inspections as Class II violations. The CUPA has a clear understanding and implements the appropriate enforcement actions, elevating repeat minor violations to Class II violations.

**CUPA Corrective Action**: Sacramento County EMD immediately instructed staff to ensure that the classification level of repeat violations was updated when appropriate. As noted by the audit, the resolution of these violations had always been handled correctly by EMD and no other process changes were required.

**Deficiency:** The CUPA is not inspecting all Cal-ARP program stationary sources within their jurisdiction at least every three years. The CUPA is only meeting 80% of their mandated frequency over the last three years – FY 02/03, 03/04/04/05 but clearly upon review of the last four Summary Reports (01/02, 02/03, 03/04, 04/05) the CUPA has increased yearly the percentage of facilities inspected per year from 16% in FY 01/02 to 35% in FY 04/05.

**CUPA Corrective Action:** As noted by the audit findings, EMD had already implemented an inspection strategy at the time of the audit that was making steady progress to complete inspections of all facilities with stationary sources on at least a triennial basis. That goal was attained in February 2006 and a zero-delinquency inspection rate has been maintained since that time.